

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

ROSY GIRON DE REYES;  
JOSE DAGOBERTO REYES;  
FELIX BOLANOS; RUTH RIVAS;  
YOVANA JALDIN SOLIS; ESTEBAN  
MOYA YRAPURA; ROSA AMAYA; and  
HERBERT SARAVIA,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**DECLARATION OF WILLIAM A.V. CLARK, PH.D.**

I, William A.V. Clark, declare and state as follows:

1. Unless stated on information and belief, I make this declaration based on my own personal knowledge.

2. I am a geographer and demographer by training and I am Research Professor of Geography at UCLA. My research interests are in residential mobility, housing choice, neighborhood change, and the impacts of demographic shifts, including international migration, on local areas. I have published widely on these topics—including nine books and about 400 research papers and reports. I have also taught graduate courses on housing and migration and undergraduate courses on population. I have attached my curriculum vitae—which provides a complete summary of my educational background, work experiences, consulting, publications, and research contributions—as **Exhibit A** to my declaration.

3. I was retained as an expert witness by counsel for Plaintiffs in this action. My hourly rate for research and testimony in this action is \$300. My compensation is not tied to or contingent upon the outcome of this litigation.

4. In connection with this action, I was asked to prepare an expert opening report (“Expert Opening Report”) analyzing whether the Defendants’ policy of requiring proof of citizenship at the Waples Mobile Home Park (the “Park”) has a disproportionate impact on the Latino population in Virginia, Fairfax County, Fairfax City, Census tract 4406, and the Waples Mobile Home Park (the “Park”). I have attached the Expert Opening Report as **Exhibit B** to my declaration.

5. I prepared the Expert Opening Report using my background in geography, demography, and statistics, as well as my experience providing research and expert testimony on housing patterns, housing segregation, and housing discrimination. I have personal knowledge of the contents, analysis, and conclusions of the Expert Opening Report. To the best of my knowledge, the analysis I conducted was consistent with sound and generally accepted demographic and statistical principles.

6. Based on the research and analysis I conducted for the Expert Opening Report, it is my conclusion that the Defendants’ policy has a disproportionate impact on Latino individuals. Further, this disproportionate impact exists at the State, County, and local levels, including within the Park itself.

7. In connection with this action, I was also asked to prepare an expert reply report (“Expert Reply Report”) addressing issues raised by Defendants’ expert, Dr. Daniel Weinberg, relating to my Expert Opening Report. I have attached the Expert Reply Report as **Exhibit C** to my declaration.

8. I prepared the Expert Reply Report using my background in geography, demography, and statistics, as well as my experience providing research and expert testimony on housing patterns, housing segregation, and housing discrimination. I have personal knowledge of the contents, analysis, and conclusions of the Expert Reply Report. To the best of my knowledge, the analysis I conducted was consistent with sound and generally accepted demographic and statistical principles.

9. Based on the research and analysis I conducted for the Expert Reply Report, my conclusions regarding the disproportionate impact caused by Defendants' policy remain unchanged. It remains my belief that Defendants' policy has had and, while in force, will continue to have a disparate impact on the Latino population at the Park.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 22 day of December, 2016 in Los Angeles, California.

Signed:

  
William A.V. Clark

# EXHIBIT 1(A)

**Curriculum Vita -- William A.V. Clark**

**WILLIAM A.V. CLARK**  
**Vita and Bibliography**

**ADDRESS**

Department of Geography  
1255 Bunche Hall  
UCLA  
Los Angeles, CA 90024  
(310) 273 0264

**BIRTHPLACE/CITIZENSHIP**

Christchurch, New Zealand  
21 March 1938  
U.S. Citizen/New Zealand Citizen

**EDUCATION**

B.A. University of New Zealand, 1960  
M.A. (First Class Honours) University of New Zealand, 1961  
Ph.D. University of Illinois (Geography), 1964

**PROFESSIONAL EXPERIENCE**

2010 -	Distinguished Research Professor, University of California, Los Angeles
1997- 10	Professor of Geography and Statistics, Department of Geography, University of California, Los Angeles (UCLA).
1995-97	Chairperson, Department of Geography, UCLA.
1991-95	Professor of Geography, Department of Geography, UCLA
1987-91	Chairperson, Department of Geography, UCLA.
1989	Belle Van Zuylen Professor, University of Utrecht, The Netherlands.
1981	Visiting Professor of Geography, Institute for Geographical Studies and Urban and Regional Planning. The Free University of Amsterdam, The Netherlands.
1977-81	Associate Director, Institute for Social Science Research, University of California, Los Angeles.
1974	Visiting Professor of Geography, University of Auckland, New Zealand.
1973	Professor of Geography, University of California, Los Angeles
1971-73	Acting Associate Director, Institute of Government and Public Affairs, University of California.

# **Curriculum Vita -- William A.V. Clark**

- 1970-72 Associate Professor of Geography, Department of Geography, University of California, Los Angeles.
- 1966-70 Associate/Assistant Professor of Geography and Adjunct Associate Professor of Urban and Regional Planning, University of Wisconsin.
- 1964-66 Lecturer in Geography, Department of Geography, University of Canterbury, Christchurch, New Zealand.
- 1964 Research Associate, Bureau of Business and Economic Research, State University of Iowa, Iowa City.
- 1961-64 Research Assistant, Teaching Fellow and University Fellow, Department of Geography, University of Illinois.
- 1961 Assistant Lecturer, Department of Geography, University of New Zealand, Christchurch, New Zealand.

## **HONORS/AWARDS**

- New Zealand Geographic Society, Distinguished New Zealand Geographer Medal, 2015.
- Benjamin Meaker Research Fellowship, October 2014, Bristol University, Bristol, UK.
- Mellon Foundation Emeritus Research Fellowship 2011-2013.
- Economic and Social Research Council Fellowship (United Kingdom) – Visiting Professor University of St. Andrews Scotland, 2011.
- Fulbright Senior Specialist, Victoria University Wellington, New Zealand, July-August 2008.
- University of Illinois, College of Liberal Arts and Sciences, LAS Alumni Achievement Award, 2006
- Elected to the National Academy of Sciences, 2005
- Decade of Behavior Research Award, 2005
- Elected Fellow of the American Academy of Arts and Sciences, 2003
- Prize from the Friends of the DIW (German Institute for Economic Research) for *Entry to Homeownership in Germany: Some comparisons with the United States*, 2000.
- Elected Honorary Fellow, Royal Society of New Zealand, 1997
- Award from Choice Magazine for *Households and Housing*, 1997
- Guggenheim Fellowship, 1994-1995
- DSc (Doctor of Science), University of Auckland, 1994
- Fellowship-in-Residence, Netherlands Institute of Advanced Studies in the Humanities and Social Sciences, 1993
- Hart Visiting Fellowship, Department of Geography, University of Sheffield, 1993

**Curriculum Vita -- William A.V. Clark**

Doctorate Honoris Causis (Honorary Doctorate), University of Utrecht, The Netherlands, 1992

Belle Van Zuylen Professorship, University of Utrecht, The Netherlands, 1989

Honors Award of the Association of American Geographers, 1987

Howard G. Roepke Lectureship in Economic Geography, 1987

Fulbright Fellowship, 1961

**PROFESSIONAL ACTIVITIES**

Consultant and Expert Witness, Jones, et al. v. Travelers Casualty Insurance. Company Case No. CV 13-02390 LHK United States District Court, Northern District of California

Consultant and Expert Witness, State Of Arkansas, Little Rock School District v. Pulaski County Special School District, 2013

Scientific Advisory Board, Linneaus Center for Social Policy and Family Dynamics in Europe (SPaDE), Stockholm University, Sweden 2012-

Consultant and Expert Witness, Pitt County School District, Everett et al v. Pitt County Schools 2012-2013.

Consultant and Expert Witness, United States Department of Justice v. Donald Sterling et al. 2007- 2009.

Consultant and Expert Witness to Epstein Becker and Green (NYC) U.S. ex rel. Anti-Discrimination Center of Metro New York, Inc. v. Westchester County 2008-2009.

Appointed to the Editorial Board of Population, Space and Place, 2006.

Consultant and Expert Witness for the United States Department of Justice, Thompson v. HUD, 2005-2006.

Consultant to Manatt and Phelps, Housing Rights Center versus Donald Sterling et al. 2004-2005.

Consultant and Expert Witness, United States Department of Justice, Thompson v. HUD, 2003.

Consultant and Expert Witness, Fulton County School Board, Atlanta, Hightower v. West, 2000-2003.

Editorial Board, Urban Affairs Review, 2001-2004.

Editorial Board, Population and Environment, 2000-

Appointed member, International Geographical Union, Study Group: Global Change and Human Mobility, 2000-2004



**Curriculum Vita -- William A.V. Clark**

External Reviewer, University of Arizona, Department of Geography, 2000.

Consultant and Expert Witness, State of Michigan, Berry vs. The School District of Benton Harbor, Michigan 2000-2001.

Consultant and Expert Witness, Proyecto Pastoral, et al vs. County of Los Angeles, et al. 1999.

Consultant and Expert Witness, "Swann vs. Charlotte Mecklenburg Board of Education", 1998-99.

Consultant and Expert Witness, Prince George's County School District, "Vaughns vs. Prince George's County School System", 1997.

Consultant to State Attorney General's Office, State of Minnesota, 1996-1998.

Consultant and Expert Witness, "United States et. al. vs. State of Georgia and James and Sandra Godfrey et. al. vs. The Troop County School District", 1996-1997.

Appointed Associate member of the International Geographical Union, Commission on Population Geography, 1996-2004.

Consultant and Expert Witness, Hillsborough County Schools, "Manning vs. The Hillsborough County School System", 1996.

Consultant to State of Wisconsin, Attorney General's Office, "Milwaukee Branch of the NAACP vs. Thompson", 1996.

UCLA, Instructional Research and Computing Committee, 1996-1997

Editorial Board, Geographical Analysis, 1996-2002

Consultant and Expert Witness, "Liddell vs. Board of Education, St. Louis", 1995-1996.

University of Melbourne, Melbourne, Australia, External Reviewer, Department of Geography, July 1995.

Member of the Rediscovering Geography Committee of the National Academy of Sciences, 1994-1996.

Consultant to Foley and Lardner and Expert Witness, "NAACP vs. American Family Insurance", 1993-1995.

Consultant and Expert Witness, hearing on unitary status, "Lockett vs. Board of Education of Muscogee County School District", 1991-1994.

Invited Reviewer, Dutch National Science Foundation, Population Priority Program 5 year Review, May, 1994.

Expert Witness, "Tasby vs. Woolery et. al." (Dallas Independent School District request for unitary status), 1994.

Expert Witness, Kansas City, Missouri School Desegregation "Jenkins et al vs. State of Missouri", 1992-1994.

Expert Witness, Grand Jury Selection and Composition, "State of California vs. Vallarino et al.", 1992-1993.

**Curriculum Vita -- William A.V. Clark**

Consultant to Los Angeles County District Attorney's Office, Redistricting for the Board of Supervisors, 1992-1993.

Appointed to membership of the Population Commission of the International Geographical Union, 1992-1996.

Consultant to Remcho Johansen and Purcel and the Panama Buena Vista School District, Kern County, California, 1992.

Referee, Economic and Social Research Council/ISC, United Kingdom Census Initiative Program, 1992.

Program Committee, Association of American Geographers, 1991-1992.

Consultant to California State Attorney General's Office, 1991-1992.

UCLA, Marshak Colloquium Committee 1991-.

UCLA, Five year review committee for ISSR, 1991-1992.

Consultant to The Netherlands National Science Foundation - Program in Population Studies, 1990-1991.

Consultant and Expert Witness, County of Los Angeles, Office of County Counsel, "Garza et al. and the United States of America vs. County of Los Angeles, California Board of Supervisors, et al., 1988-1991.

Expert Witness, City of San Clemente, 1988.

Chairperson, National Science Foundation Oversight Panel for Geography and Regional Science, 1988.

Expert Witness, Belmar Board of Education, 1988-1989.

Consultant and Expert Witness, Charleston County School Board, Redistricting, 1989.

Co-Editor, for North America, Environment and Planning A, 1988-1998.

Expert Witness, Charleston County School Desegregation, "United States vs. Charleston County School Board", 1986-1988.

UCLA, Education Abroad Committee, 1987-2000.

Editorial Board, Geographical Analysis, 1987-1995.

Consultant to the State Attorney General's Office, 1987-88, School Segregation in the Los Angeles Unified School District.

Chairperson, Dorothy Thomas Awards Committee of the Population Association of America, 1987-1988 and member, Dorothy Thomas Awards Committee of the Population Association of America, 1985-87.

Expert Witness, Oklahoma City Independent School District, "The Board of Education of the Oklahoma City Public Schools vs. Dowell et al.", 1987.

Editorial Advisory Board, Progress in Human Geography, London, 1987-1990

**Curriculum Vita -- William A.V. Clark**

UCLA, Chair of the Advisory Committee, Institute for Social Science Research, 1986-1987.

External Reviewer, Department of Geography, University of Washington, Seattle, Washington, 1986.

Consultant to County of Los Angeles, Office of County Counsel, Rental Housing in Los Angeles, 1986-1987.

Expert Witness, DeKalb County Desegregation Case, "Willie Eugene Pitts vs. Robert Freeman et al.", 1986-1988.

Expert Witness, Milwaukee Metropolitan School Desegregation Case, "Board of School District of the City of Milwaukee et al. vs. Anthony S. Earl et al.", 1986-1987.

Expert Witness, Topeka School Desegregation Case, "Oliver Brown and Charles and Kimberly Smith et al. vs. Board of Education of Topeka", 1986.

Consulting Editor, Tijdschrift voor Economische en Sociale Geografie, The Netherlands, 1985-1988.

Invited Testimony before the U.S. Commission on Civil Rights, 1985, Issues in Housing Discrimination.

Editor, Geographical Analysis 1984-1987.

Consultant to Southern California Center for Law in the Public Interest, Housing in Orange County, 1984.

Expert Witness, Norfolk, Virginia School Board, "Riddick et al. vs. City of Norfolk School Board et al.", 1983.

UCLA Advisory Committee, Institute for Social Science Research, 1983-1986.

Expert Witness, Wayne County Metropolitan School Desegregation Case, "The Goldsboro City Board of Education vs. The Wayne County Board of Education", 1982-1983.

National Science Foundation, Review Panel, Geography and Regional Science, 1981-1983.

Expert Witness, Kansas City Metropolitan School Desegregation, "Jenkins et al vs. The State of Missouri", 1980-1983.

Editorial Board, Urban Geography, 1980-1992.

Editorial Board, Annals, Association of American Geographers, 1979-1984.

Editorial Board, Geography and the Urban Environment, John Wiley and Sons (U.K.), 1978-1984.

Editorial Board, Geographical Analysis, Ohio State University Press, 1978-1984.

Expert Witness, Milwaukee School Desegregation, Milwaukee, Wisconsin, 1978.

Expert Witness, Omaha School Desegregation, "United States et al. vs. The School District of Omaha et al.", 1978.

Expert Witness, Atlanta Metropolitan School Desegregation Case, "Armour v. Nix", Atlanta, DeKalb and Fulton School Boards, 1977-1978.

**Curriculum Vita -- William A.V. Clark**

Association of American Geographers, Honors Committee, 1976.

UCLA Council on Budget and Interdepartmental Relations, 1976-1977.

UCLA Department of Geography, Graduate Advisor, 1974-1976.

UCLA Institute for Social Science Research, Chairman, Executive and Advisory Committees, 1974-1977.

Association of American Geographers, Committee on Community and Regional Planning, 1973-1976.

UCLA Executive Committee, College of Letters and Science, 1971-1973.

UCLA Institute of Government and Public Affairs, Advisory Committee, 1971-1974.

UCLA Survey Research Center, Advisory Committee, 1970-1971.

New Zealand Geographical Society, Treasurer, 1966.

**PROFESSIONAL ORGANIZATIONS**

Association of American Geographers  
European Network for Housing Research  
New Zealand Geographical Society  
Population Association of America  
Western Regional Science Association

**RESEARCH AREAS**

My research has focused on the nature of demographic change in large cities and the impacts on neighborhoods, housing and schools. The work reported in more than 400 research articles, reports and 9 books examines the nature of individual residential mobility including flows between cities and suburbs, white flight and the impact of international migration on neighborhoods and communities, especially in California. I have combined my dual interests in geography and demography to study residential segregation in U.S. cities, as well as the intersection of migration and labor force participation. Mobility both affects and is affected by locational choices and my research has studied the overall neighborhood impact on the likelihood of moving and the outcomes. Ongoing research is investigating the nature of the intention to move or stay and the role of the neighborhood in that decision. Current research is focused on three broad research topics – (1) residential segregation and residential selection with urban areas, (2) the neighborhood context of housing choice and community attachment, and (3) patterns of migration, mobility, and labor force participation across cities and regions.

**Curriculum Vita -- William A.V. Clark****RESEARCH SUPPORT**

Robert Schalkenbach Foundation, New York, 1965-1967, Property Taxation and Its Impact on Urban Growth and Change in New Zealand.

University of Wisconsin Graduate School Research Committee, 1967-1969, Intraurban Population Mobility.

Research Committee of the Graduate Division, UCLA, 1970-1973, Models of Intraurban and Intraregional Residential Mobility.

National Science Foundation, 1976, Ph.D. Dissertation Support for Gary L. Gaile.

Mathematical Social Science Board (National Science Foundation), 1976. A Conference: The Study of Geographic Mobility.

National Science Foundation, 1976-1978, Analysis of Intraurban Migration.

National Science Foundation, 1978-1979, Decision Making and Search Models of Intraurban Migration.

National Center for Health Statistics, 1978-1979. A Manual for Conducting Random Digit Dialing Telephone Surveys for State and Local Areas.

Department of Housing and Urban Development, 1979. A Conference: Policy Implications of Research on Residential Mobility.

City of Los Angeles, 1980, Market Analysis and Statistical Research on Rental Housing in the City of Los Angeles.

National Science Foundation, 1981-1983, A Multi-Attribute Housing Disequilibrium Model of Residential Mobility.

National Science Foundation, 1983-1985, Contextual and Policy Impacts on Residential Mobility.

The John Randolph Haynes and Dora Haynes Foundation, 1985-1986, Desegregation Programs and School System Impacts.

National Science Foundation, 1985-1987, Modelling Mobility with Large Data Sets.

National Science Foundation, 1989, Human Dimensions of Global Change, A Conference.

National Science Foundation, 1989-91, Redistributive Effects of Metropolitan Population Movements.

SPPSR Research and Schoolwide Programs DOT Grant No. DTRS92-G-0009.

Work-Residence Relationships in Restructuring Metropolitan Areas, 1994-1995.

National Science Foundation, 2000-2003. Collaborative Research : The Impact of Migration on Women in Dual-Earner Families: A Longitudinal and Geographic Assessment of Family Migration Theory.

Center for Immigration Studies, 1998-2000. The Hispanic Middle Class.

University of California Transportation Center. Does Distance Matter? Commuting Tolerance and Residential Change, 2000-2001.

University of California, Institute for Industrial Relations, Ethnic Two worker households in the Californian Economy, 2001.

University of California Transportation Center. How Does Travel Behavior Change When Households Change Jobs? 2001-2002.

**Curriculum Vita -- William A.V. Clark**

University of California Transportation Center. How Much Do Low Income and Foreign-Born Households Use Public Transportation? 2005-2007.

Mellon Foundation Research Support for Studies of Immigration, 2011-2013.

UCLA Research Foundation support for Comparing movers and stayers in neighborhood contexts in Los Angeles 2011-2012

UCLA Research Foundation support for Residential transitions in the Life Course 2014-2015

Randolph Haynes and Dora Haynes Foundation support for the project Will "Millennials" Change Race and Ethnic Relationships in Southern California?

**Curriculum Vita -- William A.V. Clark****RESEARCH PUBLICATIONS*****Books/Monographs***

- David Clapham, William A.V. Clark and Kenneth Gibb (2012) The Sage Handbook of Housing. London, UK. Sage Publications
- W.A.V. Clark (2003) Immigrants and the American Dream: Remaking the Middle Class. New York: Guilford Press
- W.A.V. Clark (1998) The California Cauldron: Immigration and the Fortunes of Local Communities. New York: Guilford Press.
- W.A.V. Clark, F.M. Dieleman (1996) Households and Housing: Choice and Outcomes in the Housing market. Rutgers University, Center for Urban Policy Research.
- W.A.V. Clark (1986) Human Migration: An Introduction to Population Movement. Sage Publications.
- William. A.V. Clark and P.L. Hosking (1986) Statistical Methods for Geographers. John Wiley and Sons.
- William A.V. Clark, ed. (1982) Modelling Housing Market Search. London, United Kingdom: Croom Helm.
- William A.V. Clark and Eric G. Moore, eds. (1980) Residential Mobility and Public Policy, Beverly Hills, Sage Publications.
- William A.V. Clark and E.G. Moore, eds. (1978) Population Mobility and Residential Change. Evanston, IL: Northwestern University Press.
- H.J. Nelson and W.A.V. Clark (1976) The Los Angeles Metropolitan Experience: Uniqueness, Generality and the Goal of the Good Life. Cambridge, MA: Ballinger.

***Research Articles/Chapters*****1961**

- W.A.V. Clark (1961) The slums of Dunedin 1900-1910, Proceedings of the Third New Zealand Geography Conference, No. 3, 85-92.

**1962**

- W.A.V. Clark (1962) Dunedin at the turn of the century, New Zealand Geographer, 18, 93-115.

**1963**

- Ronald R. Boyce and W.A.V. Clark (1963) Selected spatial variables and central business district sales, Papers, The Regional Science Association, 11, 167-193.

**1964**

- Ronald R. Boyce and W.A.V. Clark (1964) The concept of shape in geography, Geographical Review, 54, 561-572.



**Curriculum Vita -- William A.V. Clark****1965**

Robert O. Harvey and W.A.V. Clark (1965) Controlling urban growth: the New Zealand and Australian experiment, The Appraisal Journal, 32, 551-558.

Robert O. Harvey and W.A.V. Clark (1965) The nature and economics of urban sprawl, Land Economics, 61, 1-9.

Reprinted in Ekistics 20, 132, 134 (1970)

Reprinted in The nature and economics of urban sprawl, in L.S. Bourne (ed.) Internal Structure of the City, Oxford (1971).

W.A.V. Clark (1965) Markov chain analysis in geography: An application to the movement of rental housing areas, Annals, Association American Geographers, 55, 351-359.

**1966**

W.A.V. Clark (1966) Urban renewal in the United States: Clearance or conservation? Local Body Review (N.Z.) 2, 463-465.

R.G. Golledge, G. Rushton and W.A.V. Clark (1966) Some spatial characteristics of Iowa's dispersed farm population and their implications for the grouping of central place functions Economic Geography, 42, 261-272.

**1967**

W.A.V. Clark (1967) The spatial structure of retail functions in a New Zealand city, New Zealand Geographer 23, 64-66.

G. Rushton, R.G. Golledge and W.A.V. Clark (1967) A model for the spatial allocation of grocery expenditures by a dispersed population. Annals, Association American Geographers, 57, 389-400.

W.A.V. Clark (1967) A note on the use of residuals from regression in geographical research, New Zealand Geographer, 23, 64-66.

**1968**

W.A.V. Clark (1968) Consumer travel patterns and the concept of range, Annals, Association American Geographers, 58, 386-396.

**1969**

W.A.V. Clark (1969) Applications of spacing models in intracity studies, Geographical Analysis, 1, 391-399.

W.A.V. Clark (1969) Information flows and intraurban migration: An empirical analysis, Proceedings, Association American Geographers, 1, 38-42.

**1970**

W.A.V. Clark and G. Rushton (1970) Models of intraurban consumer behavior and their implications for central place theory, Economic Geography, 46, 486-497.

W.A.V. Clark, G. Rushton, and R.G. Golledge (1970) The spatial structure of the Iowa urban network, Geographical Analysis, 2, 301-313.

C. Hansell and W.A.V. Clark (1970) A simulation of the expansion of the Negro ghetto in Milwaukee--1959-1960, Tijdschrift voor Econ. en Sociale Geografie, 61, 265-277.

W.A.V. Clark and G. Rushton (1970) A method of analyzing the relationship of a population to distributed facilities, Environment and Behavior, 2, 192-207.

W.A.V. Clark (1970) Measurement and explanation in intraurban residential mobility, Tijdschrift v. Econ. en Sociale Geografie, 61, 49-57.



**Curriculum Vita -- William A.V. Clark****1971**

W.A.V. Clark (1971) A test of directional bias in residential mobility, in H. McConnell and D. Yaseen (eds.) Models of Spatial Variation, DeKalb, IL: Northern Illinois University Press, 1-27.

**1972**

W.A.V. Clark (1972) Some vector representation of intraurban residential mobility, International Geography 1972 (Proceedings IGU Congress, Montreal, Canada), 2, 796-798.

W.A.V. Clark (1972) Behavior and the constraints of spatial structure, New Zealand Geographer, 28, 171-180.

W.A.V. Clark (1972) Patterns of black intraurban mobility and restricted relocation opportunities, In: H. Rose, (ed.) Geographical Aspects of the Ghetto, Dekalb, IL: Northern Illinois Press, 111-127.

**1973**

Clark, W. A.V. and Cadwallader, Martin (1973) Locational stress and residential mobility. Environment and Behavior, Vol 5(1), Mar 1973, 29-41

W.A.V. Clark and Martin Cadwallader (1973) Residential preferences: an alternate view of intraurban space, Environment and Planning, 5, 693-703.

W.A.V. Clark and Gary L. Gaile (1973) The analysis and recognition of shapes, Geografiska Annaler, 55. Ser. B, 153-163.

**1974**

W.A.V. Clark (1974) The Impact of Property Taxation on Urban Spatial Development. Institute of Government and Public Affairs. Los Angeles, University of California.

W.A.V. Clark, P.L. Hosking and D.L. Ranken (1974) A note on factor analysis and the development of urban theory, Pacific Viewpoint, 15, 162-164.

**1975**

W.A.V. Clark (1975) Myth and reality in Los Angeles: the future of a metropolitan area, New Zealand Journal of Geography, 58, 1-9.

**1976**

W.A.V. Clark (1976) Technical and substantive approaches to spatial behavior: a commentary, in R.G. Golledge and G. Rushton, Spatial Choice and Spatial Behavior: Geographic Essays on the Analysis of Preferences and Perceptions. Columbus, Ohio: Ohio State University Press, 301-311.

W.A.V. Clark (1976) Entropy as a measure of diversity in migration flows, International Geography 7 (Geography of Population), 20-22.

W. A.V. Clark (1976) Migration in Milwaukee, Economic Geography, 52, 48-60.

W.A.V. Clark and Karen L. Avery (1976) The effects of data aggregation in statistical analysis, Geographical Analysis, 8, 428-438.

**1977**

W.A.V. Clark and James O. Huff (1977) Some empirical tests of duration of stay effects in intraurban migration, Environment and Planning 9, 1357-1374

**Curriculum Vita -- William A.V. Clark****1978**

- W.A.V. Clark and Karen L. Avery (1978) Patterns of migration: a macroanalytic case study, In: David Herbett and R.J. Johnston, Geography and the Urban Environment, Wiley, 135-196.
- W.A.V. Clark and Karen L. Avery (1978) Aggregation and statistical analysis: a comment. Geographical Analysis, 10, 194-195.
- James O. Huff and W.A.V. Clark (1978) The role of stationarity in Markov and opportunity models of intraurban migration, in: W.A.V. Clark and E.G. Moore, Population Mobility and Residential Change. Evanston: Northwestern University Press, 183-213.
- W.A.V. Clark and James O. Huff (1978) Cumulative stress and cumulative inertia: a behavioral model of the decision to move, Environment and Planning A, 10, 1357-1376.

**1979**

- T.R. Smith, W.A.V. Clark, J.O. Huff, and P. Shapiro (1979) A decision making and search model for intraurban migration, Geographical Analysis, 11, 1-22.
- W.A.V. Clark, James O. Huff and J.E. Burt (1979) Calibrating a model of the decision to move, Environment and Planning A, 11, 689-704.
- W.A.V. Clark and T.R. Smith (1979) Modelling information use in a spatial context, Annals Association of American Geographers, 69, 575-588.

**1980**

- W.A.V. Clark (1980) Preface: Looking back at why families move, in: P. Rossi, Why Families Move: 1980 Edition Beverly Hills, CA: Sage Publications.
- W.A.V. Clark and James Burt (1980) The impact of workplace on residential relocation. Annals Association of American Geographers 70, 59-67.
- T.R. Smith and W.A.V. Clark (1980) The effects of subjective information costs on the efficiency and sequential structure of housing market search, in W.A.V. Clark and Eric G. Moore (eds.), Residential Mobility and Public Policy, Beverly Hills, CA: Sage Publications.
- W.A.V. Clark (1980) Residential mobility and neighborhood change: some implications for racial residential segregation. Urban Geography 1, 101-124.

**1981**

- W.A.V. Clark (1981) Guest Editorial: The social scientist as expert witness, Environment and Planning A, 13, 1468-1470.
- W.A.V. Clark and J.O. Huff (1981) Sources of spatial variation in residential mobility rates, Urban Geography 1, 202-214.
- W.A.V. Clark (1981) On modelling search behavior, in D. Griffith and R. MacKinnon (eds.), Dynamic Spatial Models, Sijthoff and Noordhoff, 102-131.
- W.A.V. Clark (1981) A revealed preference analysis of intraurban migration choice, in: R.G. Golledge and J. Rayner (eds.), Proximity and Preference. University of Minnesota Press, 144-168.

**Curriculum Vita -- William A.V. Clark**

- W.A.V. Clark (1981) Residential mobility and behavioral geography: parallelism or independence, In: K.R. Cox and R.G. Golledge (eds.) Behavioral Problems in Geography Revisited. Methuen, 182-205.
- W.A.V. Clark (1981) Some observations on the structure of recent research on migration and mobility, Geografische en Planologische Notities, No. 10, Amsterdam, The Netherlands.
- W.A.V. Clark and P.C.J. Everaers (1981) Public policy and residential mobility in Dutch cities, Tijdschrift voor Economische en Sociale Geografie 72, 322-333.
- 1982**
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William A.V. Clark (2012) Moving and Staying in Los Angeles: Money matters but so does family composition. *Cityscape* 14, 115-135, 2012.



**Curriculum Vita -- William A.V. Clark****2013**

- William A.V. Clark and Natasha Rivers (2013) Community Choice in Large Cities: Selectivity and Ethnic Sorting across Neighbourhoods In “*Understanding Neighbourhood Dynamics: New Insights for Neighbourhood Effects Research*” Van Ham M., Manley D., Bailey N., Simpson L. & Maclennan D. (eds). Springer: Dordrecht.
- William A.V. Clark (2013) The aftermath of the general financial crisis for the ownership society : what happened to low incomes households in the United States. *International Journal of Housing Policy* 13, 227-246.
- William A.V. Clark (2013) Life course events and residential change: unpacking age effects on the probability of moving *Journal of Population Research* 30, 319-334.
- William A.V. Clark (2013) Comparing socio-spatial mobility and its outcomes in Australia and New Zealand . *15<sup>th</sup> Labour, Employment and Work Conference*, Wellington, New Zealand, November 2012.

**2014**

- William A.V. Clark, Maarten VanHam and Rory Coulter (2014) Spatial mobility and social outcomes. *Journal of Housing and the Built Environment* 29(4) 699-727
- Thomas Niedomsyl and William A.V. Clark (2014) What matters for internal migration, jobs of amenities. *Migration Letters* 11, 377-386
- John Osth, William A.V. Clark and Bo Malmberg (2014) Measuring the scale of segregation using K-nearest neighborhood aggregates. *Geographical Analysis* 46 , 1-16

**2015**

- William A.V. Clark and Regan Maas (2015) Interpreting migration through the prism of reasons for moves. *Population Space and Place* 21 54-67 ONLINE 2013
- William A. V. Clark and Regan Maas (2015) Spatial Mobility and Opportunity in Australia: Residential Selection and Neighborhood Connections *Urban Studies (ONLINE)*.
- Philip Morrison and William A.V. Clark (2015) Why do they stay? Loss aversion and Duration of Residence *California Center for Population Research On-Line Working Paper Series*
- William A.V. Clark, Eva Andersson, John Osth, Bo Malmberg (2015) A Multi-scalar Analysis of Neighborhood Composition in Los Angeles 2000-2010: A Location-Based Approach to Segregation and Diversity. *Annals, Association of American Geographers*. Online first September 2015
- William A.V. Clark (2015) Residential Segregation: Recent Trends. Elsevier *Encyclopedia of the Social Sciences*.
- Martin Korpi and William A.V. Clark (2015) Internal Migration and Human Capital Theory: To What Extent Is It Selective? *Economic Letters* 136:31-34.
- William A.V. Clark (2015) *Neighborhoods and the structure of society: Implications for work and residence in the internet-age*. In Colin Mason, Darja Reuschke, Stephen Syrett and Maarten van Ham: *Entrepreneurship in Cities: Neighbourhoods, Households and Homes* London, Edward Elgar

**Curriculum Vita -- William A.V. Clark**

William A.V. Clark, Ricardo Duque, Isabel Palmares (2015) Place attachment and the decision to stay in the neighborhood. *Population Space and Place*. DOI: 10.1002/psp.2001

William A.V. Clark , Rory Coulter (2015) Who wants to leave the neighborhood: The role of Neighborhood Change. *Environment and Planning A*.

**2016**

William A. V. Clark & William Lisowski (2016): Decisions to move and decisions to stay: life course events and mobility outcomes, *Housing Studies*, DOI:10.1080/02673037.2016.1210100

William A. V. Clark (2016) Life events and moves under duress: disruption in the life course and mobility outcomes, *Longitudinal and Life Course Studies* 7 (3) 218–239

Mary Clare Lennon William A.V. Clark Heather Joshi (2016) Guest Editorial: Residential mobility and wellbeing: exploring children's living situations and their implications for housing policy. *Longitudinal and Life Course Studies* 7 (3) 197–200

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*Accepted for Publication***2017**

Martin Korpi and William A. V. Clark (2017) Human Capital Theory and Internal Migration: Do Average Outcomes Distort Our View of Migrant Motives?" *Migration Letters*. 14.

**Curriculum Vita -- William A.V. Clark****REPORTS AND ABSTRACTS**

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Ronald R. Boyce and W.A.V. Clark (1963) The concept of shape in geography, with an example of its importance in geography. Annual meeting of the Association of American Geographers, Denver, Abstract, A.A.A.G., 53, 417.

W.A.V. Clark (1964) Markov chain analysis in geography: an application to the movement of rental housing areas. Annual meeting of the Association of American Geographers, Syracuse, Abstract, A.A.A.G., 55, 417.

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W.A.V. Clark and J.O. Huff (1978) Duration of Stay effects and occupancy patterns in the city, Association of American Geographers, Abstracts, 219.



**Curriculum Vita -- William A.V. Clark**

W.A.V. Clark (1978) Some comments on the role of users in accessing machine readable data files, In: Report on the Conference on Cataloging and Information Services for Machine Readable Data Files, Airlie House: Warrenton, Virginia.

W.A.V. Clark and T.R. Smith (1979) Information use in residential search models, Association of American Geographers, Abstracts, 100.

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W.A.V. Clark (1983) Linking housing choice and residential mobility. Population Association of America, Abstracts, 83.

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W.A.V. Clark, M.C. Deurloo and F.M. Dieleman (1984) A disequilibrium approach to housing markets and mobility in the Netherlands, Association of American Geographers, Abstracts, 230.

W.A.V. Clark (1985) Residential preferences, residential choice and neighborhood change, Association of American Geographers, Abstracts, 224.

W.A.V. Clark, M.C. Deurloo, and F.M. Dieleman (1986) Tenure choice in complex housing markets: the Dutch case. Abstracts, 230.

F.M. Dieleman and W.A.V. Clark (1987) Modelling strategies for housing and tenure choice, Association of American Geographers, Abstracts, 21.

W.A.V. Clark, D.J. Armor (1988) An evaluation of alternative desegregation plans for Charleston County. A report to Judge Sol Blatt, Jr., Chief Judge, U.S. District Court, South Carolina.

**Curriculum Vita -- William A.V. Clark**

W.A.V. Clark (1988) Using and interpreting generalized log-linear models in Geographical Analysis. International Geographical Union Pre-Congress Symposium, Canberra.

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W.A.V. Clark (1995) Migration and Access to Homeownership. Abstracts. Population Association of America.

W.A.V. Clark (1995) Expert Report: Liddell v. Board of Education of the City of St. Louis.

W.A.V. Clark (1996) The Racial and Socio-Economic Characteristics of the County of Milwaukee and Voting Outcomes. NAACP v. Thompson.

Julian Ware and W.A.V. Clark (1996) The outcomes of civil rights gains: trends in residential integration by socio-economic status in Southern California. Abstracts. Population Association of America.

**Curriculum Vita -- William A.V. Clark**

W.A.V. Clark (1996) Migration and reaction: interpreting the vote for Proposition 187. Abstracts. Association of American Geographers, 49.

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W.A.V. Clark (2001) Views of Urban Geography from two sides of the Pacific. Association of American Geographers, Abstracts 155.

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**Curriculum Vita -- William A.V. Clark**

W.A.V. Clark and Patrick Quinlan (2002) Valley Districting Report for the Local Agency Formation Commission for Los Angeles County.

W.A.V. Clark (2002) Immigration and homeownership in Gateway cities in California. Population Association of America Abstracts, p.201.

W.A.V. Clark (2003) Residential moves and residential choices of the foreign born, Population Association of America, Abstracts, p.226

W.A.V. Clark (2003) Demographic Changes in The Fulton County School District: A report to the Court in the case of Hightower vs West et al.

W.A.V. Clark (2003) Housing Patterns and Housing Choices in Baltimore: A report to the Court in the case of Thompson vs. HUD et al.

William A.V. Clark and Philip S. Morrison (2011) Residential sorting and social mobility: recent New Zealand evidence Proceedings, Labour Employment and Work, 14<sup>th</sup> Conference, Wellington, New Zealand

**Curriculum Vita -- William A.V. Clark****REVIEWS**

W.B. Johnston (ed.), Traffic in a New Zealand City: in New Zealand Local Government, 1, 1965, 29-31.

G.M. Neutze, Economic Policy and the Size of Cities: in The New Zealand Geographer, 22, 1966, 102.

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Harold M. Mayer and Richard Wade, Chicago: The Growth of a Metropolis; in Bulletin, Special Libraries Association, Geography and Map Division, No. 81, 1970, 73.

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James E. Vance, The Merchant's World: The Geography of Wholesaling. In: Geographical Analysis, 264-269.

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Sam Bass Warner, The Urban Wilderness, A History of the American City: In: Annals Association of American Geographers, 64, 1974, 150-152.

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Leslie Martin and Lionell March (eds.), Urban Space and Structure, Cambridge University Press: In: Geographical Review, 65, 138-140.

**Curriculum Vita -- William A.V. Clark**

Michael Levinson and others, The Settlement of Polynesia: A Simulation Model, In: The New Zealand Geographer 31, 1975, 90-91.

Clyde E. Browing (ed.), Population and Urbanized Area Growth in Megalopolis, 1950-1970, In: The Professional Geographer, 1976, 28, 117-118.

David Birch and others, The New Haven Experience, In: Annals of Regional Science 10, 1976, 137-138.

Melville C. Branch (ed.) Urban Planning Theory, In: Annals of Regional Science 11, 1977, 152-153.

D.T. Herbert and R.J. Johnston, (eds.), Social Areas in Cities, Vol. 1, Spatial Processes and Spatial Form: Vol. 2, Spatial Perspectives on Problems and Policies, In: The Professional Geographer 30, 1978, 95-96.

B.J.L. Berry (ed.), Urbanization and Counter Urbanization, In: Annals Association of American Geographers 68, 1978, 297-299.

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N. Oppenheim, Applied Models in Urban and Regional Analysis, In: The Professional Geographer 32, 1980, 492-493.

H. Kendig, New Life for Old Suburbs, In: Geographical Review 71, 1981, 342-344.

B. Massam, Spatial Search, In: Environment and Planning A, 13, 1981, 1319-1320.

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H.O. Pallakowski, Urban Housing Markets and Residential Location, In: Environment and Planning A, 15, 1983, 855-856.

**Curriculum Vita -- William A.V. Clark**

G.F. De Jong and R.W. Gardner, Migration Decision Making: Multi-Disciplinary Approaches to Micro-Level Studies in Developing Countries, Geographical Review 1983.

Peter Dorram, The Expert Witness. In: Environment and Planning A, 16, 1984, 1262-1263.

Gordon C. Clark, Interregional Migration: National Policy and Social Justice, In: Government and Policy: Environment and Planning C, 2, 1984, 487-488.

Michael Schill and Richard Nathan, Revitalizing America's Cities, Neighborhood Re-Investment and Displacement. Environment and Planning A, 16, 1984, 1401-1402.

F.W. Porell, Models of Intraurban Residential Relocation, In: Progress in Human Geography, 1985.

R.J. Johnston, Residential Segregation, The State and Constitutional Conflict in American Urban Areas, In: Environment and Planning A, 1985.

A. Rogers and F. Willikens (eds.), Migration and Settlement, In: Geographical Review, 1987.

Th.W.A. Eppink, Choice of Mathematical Models and Geographic Research considering Alternatives, In: Progress in Human Geography 1989, 285-286.

John M. Goering (ed.), Housing desegregation and federal policy, In: Urban Geography, 1989.

W.H. Frey and H. Speare, Regional and Metropolitan Growth and Decline in the U.S., In: Economic Geography, 1989, 76-79.

S. Lieberman and M.C. Waters, From Many Strands: Ethnic and Racial Groups in Contemporary America. In: Environment and Planning A, 1989.

L. Long, Migration and Residential Mobility in the U.S. In: Urban Studies, 1990.

G. Tobin (ed) Divided Neighborhoods: changing patterns of racial segregation. In: Environment and Planning A, 1991.

P. Jargowsky, Poverty and Place: Ghettos, Barrios and the American City. In: Journal of American Ethnic History, 1998, 95-96.

L. Bobo, M.Oliver, J. Johnson, and A.Valenzuela. Prismatic Metropolis: Inequality in Los Angeles. In Annals Association of American Geographers 2001:781-782.

**Curriculum Vita -- William A.V. Clark**

M.Barone, The New Americans: How the Melting Pot can Work. In Population and Environment 2002:495-497.

R. Woldoff, White Flight/BlackFlight: The dynamics of Racial Change in an American Neighborhood, In American Journal of Sociology 2012 117:1525-1527



**Curriculum Vita -- William A.V. Clark****RECENT INVITED AND CONTRIBUTED PAPERS AND SEMINARS, (since 1990).**

Invited Paper, University of Buffalo, Households in the Reduction phase: outcomes of elderly mobility. March 30, 1990.

Contributed Paper, The Demography of Housing Consumption. Annual meeting of the Association of American Geographers, April 20-23, 1990.

Contributed Paper, (with Peter Morrison), Pitfalls in estimating eligible voters among hispanics. Annual meeting of the Population Association of America, May 2-5, 1990.

Invited Paper, 22nd International Congress of Applied Psychology. Preference and residential choice in a multi-ethnic setting. Kyoto, Japan, July 22-27, 1990.

President's Guest Lecture, Institute of British Geographers. Geography in Court: the role of geography in litigation. January 3-5, 1991.

Invited Lecture, Queens University, Canada. Geography in Court: expertise in adversarial settings. March 5-7, 1991.

Invited Lecture, Queens University, Canada. Recent debates in racial segregation in U.S. cities. March 5-7, 1991.

Invited Lecture, New Directions in Population Geography. Association of American Geographers Annual Meetings, Miami, April 15, 1991.

Marshak Colloquium, UCLA, Counting people, counting citizens and drawing boundaries. May 3, 1991.

Invited Seminar, Nethur, Holland, Neighborhood change and urban segregation, May 29-31, 1991.

Contributed Paper, The demographers role in the local boundary drawing process, Annual meetings Population Association of America, March 21-22, 1991.

Lecture, Demography and Migration, UCLA-Community College Geography Program, March 21, 1991.

Invited Colloquium, University of Indiana, Understanding Residential Segregation in U.S. Cities: A Revisionist View. January 24, 1992.

Invited Seminar, University of Indiana, Residential Preferences and Residential Choices in a Multi-Ethnic Setting, January 25, 1992.

**Curriculum Vita -- William A.V. Clark**

Invited Seminar, Vereniging van Utrechtse Geografie Studenten, Rassen Segregatie en VS, University of Utrecht, March 3, 1992.

Contributed Paper, Mirroring the mozaic. Annual meetings Population Association of America, April 31 - May 2, 1992.

Seminar Organizer, USA/UK migration meeting, Los Angeles California, Migration in Post Industrial Society. August 3-4, 1992.

Invited Workshop, School desegregation in the 1990s. Institute for Public Policy, George Mason University, Washington, October 23 1992.

Invited Lecture, Multi-culturalism in Los Angeles: Where, When and How? Research Coordinating Committee of Los Angeles County, December 9 1992.

Seminar Presentation, Netherlands Institute for Advanced Studies, Voting and Spatial Representation, May 1993.

Invited Presentation, Haifa, Israel, Immigration and Integration: Lessons from Southern California, May 1993.

Invited Workshop, Netherlands Graduate School of Housing and Urban Research Amsterdam. Longitudinal models, May 1994.

Contributed Paper, Internal Migration and Local Outcomes. Annual Meetings Association of American Geographers, Chicago, March 1995.

Invited Lecture, The California Cauldron: International Migration and Local Stresses. Department of Geography, University of Colorado, April 1995.

Contributed Paper, Migration and access to homeownership across nation states and within Changing Economic and Social contexts. Annual meetings Population Association of America, San Francisco, April 1995 (with F. Dieleman).

Contributed Paper, Demographic change and school district response: assessing discriminatory effects of boundary changes. Annual meetings Population Association of America, San Francisco, April 1995 (with Peter Morrison).

Seminar Presentation, Regional and Local Outcomes of Recent Immigration to the United States. Los Angeles Demographic Forum, November 1995.

Seminar Presentation, Voting and redistricting. George Mason University, November 1995.

**Curriculum Vita -- William A.V. Clark**

Contributed Paper, Trends in residential integration in Southern California. Annual meetings, Association of American Geographers, April 1996 (with Julian Ware).

Contributed Paper, Large scale immigration and political response: an evaluation of Proposition 187. Annual meetings, Association of American Geographers, April 1996.

Invited Conference paper, Immigration and the Welfare State, Berlin, December 11-12, 1996.

Invited Lecture, Immigrants and Income: Does Gender Matter. University of Arizona, September 26 1997.

Invited Seminar Presentation, Becoming a homeowner in Germany: Comparisons with the United States. Syracuse University Center for Demography and Economics of Aging, November 6 1997.

Invited Conference Paper, Housing consumption and residential crowding in the United States, European Network for Housing Research, Cardiff, Wales, September 1998.

Invited Lecture, Immigration and Population. UCLA Symposium on the Environment in Southern California in the 21<sup>st</sup> Century, March 3 1998.

Invited Seminar Presentation, Immigrant trajectories in time and space. NETHUR (Netherlands Housing and Urban Research), Utrecht, The Netherlands, March 18 1998.

Contributed Paper, Diversity and integration: Comparisons across metropolitan areas. Boston, Association of American Geographers, March 1998.

Contributed Paper (with Suzanne Davies), Changing jobs and changing houses: mobility outcomes of Employment transitions. Boston, Association of American Geographers, March 1998.

Contributed Paper (with Anita Drever), Does nationality impact housing market access in Germany? Boston, Association of American Geographers, March 1998.

Invited Lecture, Immigration and the demographic future of California. Phoenix, Arizona State University, September 4 1998.

Invited Conference Paper, Housing consumption and residential crowding in the United States, European Network for Housing Research, Cardiff, Wales, September 1998.

**Curriculum Vita -- William A.V. Clark**

Contributed paper, Changing jobs and changing houses: mobility outcomes of employment transitions. Western Regional Science Meetings, February 1999.

Invited paper, Revisiting the role of own race preferences: Comparisons across metropolitan areas and ethnic groups. Population Association of American, New York, March 1999.

Invited participant in the Metropolis Conversation Series, Second Generation Immigrants, Ottawa, November 1999.

Invited paper, Italian Academy for Advanced Studies in America. Old differences, New similarities, American and European Immigration policies in a comparative perspective. Success in American: How dependent are the new immigrants, November 1999.

Contributed paper, Immigrant penetration of US labor Markets: Successes and Failures. Pittsburgh, Association of American Geographers, April 2000.

Invited lecture, The changing demographics of California. California Wheat Commission, Sacramento Ca. March, 2000

Invited lecture, The Future of the American Population. National Conference of State Legislatures. Denver Colorado, March 2000.

Invited Lecture, The Demographic Future of California. University of California Davis, Community Development Program. March 2000.

Contributed paper ( with Frans Dieleman and Rinus Deurloo) The dynamics of metropolitan housing markets and the process of residential relocation. European Network of Housing Research, Gavle Sweden, June 2000.

Invited paper (with Anita Drever), Do immigrants improve their housing when they move. Fourth International Conference of the German Socio-Economic Panel Users, Berlin, July 2000.

Invited paper, Growth and the Quality of Life, 10<sup>th</sup> Annual UCLA Policy Research Symposium, Lake Arrowhead, October, 2000.

Contributed paper; (with Suzanne Withers) Understanding the temporal and spatial interdependencies of dual earner households: a Puget Sound Case study. Association of American Geographers, New York, 2001.

**Curriculum Vita -- William A.V. Clark**

Invited paper, Human mobility in a borderless world. Conference of the International Geographical Union Study Group – Global Change and Human Mobility, Pescara, Italy, April 2001.

Contributed paper, Views of Urban Geography from two sides of the Pacific. Association of American Geographers, New York, 2001.

Invited paper, Immigrant homeownership and middle class identification, Metropolis Conference, Rotterdam, The Netherlands, November 2001.

Contributed paper, Immigration and homeownership in Gateway cities in California. Population Association of America , April 2002.

Keynote Address, Immigrants and the Immigrant Dream. 1<sup>st</sup> Population Geographies Conference , St. Andrews Scotland, July, 2002.

Contributed paper (with Youqin Huang), Linking migration and mobility and contextual effects in British Housing Markets, 1<sup>st</sup> Population Geographies Conference, St. Andrews Scotland, July 2002.

Invited participant, A workshop on race class and urbanism .NSF sponsored workshop in Johannesburg South Africa, August 2002.

Contributed paper, Residential moves and residential choices of the foreign born, Population Association of America, May 2003.

Contributed paper, The links between mobility and migration, Western Regional Science meetings, Rio Rico Arizona, February 2003.

Invited presentation, Immigration Law: What Journalists Need to Know, University of Southern California, Annenberg Institute for Justice and Journalism, June 2003.

Contributed Paper, Evaluating policy decisions with demographic data: Evidence from the moving to opportunity study, Population Association of American, Boston, April 2004.

Contributed Paper, Mobility, housing stress and neighborhood contexts evidence from Los Angeles, Association of American Geographers, Philadelphia, April, 2004.

Contributed Paper, Residential Choices of the Newly Arrived Foreign Born: Spatial Patterns And The Implications For Assimilation, Population Association of America, Boston, 2004.

**Curriculum Vita -- William A.V. Clark**

Contributed Paper, Job access and commute penalties: balancing work and residence in Los Angeles, Second International Population Geographies Conference, St. Andrews Scotland, August, 2004.

Invited Seminar Presentation, Immigrants and the American Dream. *University of Colorado, Boulder, Colorado*, September, 2004.

Invited Seminar Presentation, Immigrants and the American Dream, *University of Tennessee, Knoxville, Tennessee*, March, 2005.

Contributed Paper, Race, class and place: evaluating mobility outcomes for African Americans, *Annual Meetings, Association of American Geographers*, March 2005.

Contributed Paper, How much does income matter in neighborhood choice? *Population Association of America, Philadelphia*, April 2005.

Invited Seminar, California Center for Population Research, Are there measurable neighborhood effects: Evidence from LAFANS. November 9, 2005.

Invited Presentation, Friends of Geography, UCLA, Demography as Destiny: How our Demographic Future will Change the Rules. November 6, 2005.

Invited Presentation, The geography of a monochrome society. *Department of Geography, University of Minnesota*, January 2006

Contributed Paper, The Geography of a monochrome society. *Population Association of America, Los Angeles*, April 2006

Contributed Paper (with Valerie Ledwith), The effect of the residential mosaic and white flight on public school composition: Evidence from Los Angeles. *Association of American Geographers, Chicago*, April 2006

Invited Presentation Workshop on Demographic Analysis and Moving Intentions: Migration, mobility and family structure- interpretations from the United States, *Max Planck Institute for Demographic Research, Rostock, Germany* May, 2006

Invited Presentation, Can we solve poverty by moving people around: evidence from the MTO study. *Ohio State University, Population Studies Center*, May, 2006

Invited Presentation, *Marschak Colloquium*, Can we solve poverty by moving people around: evidence from the MTO study? *University of California, Los Angeles* June 2006.

**Curriculum Vita -- William A.V. Clark**

Keynote Speaker, Global implications of international migration. *British Society of Population Studies*, Southampton, United Kingdom

Invited Presentation, Department of Geography, *University of Illinois*, May 2006. On the occasion of the University of Illinois Alumni Award.

President's Panel, *Association of American Geographers Annual Meetings*, San Francisco, Is There an Immigration Crisis? 18 April, 2007

Keynote Speaker, New Research on Population, Migration and Community Dynamics, National Library Auditorium, Wellington, New Zealand 15 May, 2007.

The Comeaux Lecture, Immigrants in a Globalizing World, International Flows and Local Outcomes, *Arizona State University*, March 2008.

Invited Seminar Speaker, *ESRC Neighborhood Seminar Manchester, United Kingdom*, Community Choice in Large Cities, Selectivity and Ethnic Sorting across Neighborhoods, September 2010.

Invited Seminar Speaker, School Segregation and School Outcomes, Does school segregation affect school outcomes? *Kraaga Sweden* September, 2010

Seminar Speaker, Fertility in Expensive Housing Markets, *St Andrews Scotland, Housing Research Center, University of St Andrews* May 2011.

Invited Speaker, 5<sup>th</sup> *Housing Labour and Income Conference*, Melbourne Australia. Mobility and Mobility Contexts: Modeling and Interpreting Residential Change in Australia.

Presentation, William A.V. Clark and Philip S. Morrison (2011) Residential sorting and social mobility: recent New Zealand evidence Proceedings, *Labour Employment and Work, 14<sup>th</sup> Conference, Wellington, New Zealand*.

Panel Organizer, *Association of American Geographers Annual Conference*, New York, February, 2012. Measuring segregation with new tools. Organized with Professors Bo Malmberg and John Osth, University of Stockholm.

Presentation, Interpreting migration through the prism of reasons for moves: what can we learn about the economic returns to migration from survey data? *Population Association of America*, April, 2012, San Francisco.

Plenary Speaker, Housing Shocks and Housing Outcomes, *European Network for Housing Research (ENHR)* Lillehammer, Norway, June 2012.



**Curriculum Vita -- William A.V. Clark**

Plenary Speaker, Housing in an era of Uncertainty. *International Conference on Housing Welfare and Public Policy*. Seoul National University, Seoul, Republic of Korea, Sept. 16-18, 2012.

Invited Seminar Speaker, Housing Symposium, Royal Statistical Society, London, *Housing People and Places: Two Decades of Housing Research*. London, UK, December 2013.

Invited Seminar Speaker, Uppsala University, Sweden, *Why do we live where we do: Sorting selection and satisfaction*. May, 2013

Panel Organizer, Association of American Geographers Annual Conference, *Los Angeles as a metaphor for changing metropolitan diversity*, Los Angeles, April, 2013.

Presentation, Population Association of America, *Segregation and desegregation in metropolitan contexts: Los Angeles as a paradigm for our changing ethnic world* April, 2014, Boston.

Invited Seminar, Spatial Modeling Group Bristol University, *New measures of spatial segregation*. Bristol, UK October, 2014.

Invited Speaker, Society for Longitudinal and Life Course Studies, Lausanne Switzerland, *Life events and housing outcomes: The implications for fragile families*, October 2014.

Presentation (with Thomas Niedomysl, Western Regional Science Association, *Perceived employment outcomes after migration vary by distance and reason for moving*. Tucson, February, 2015

# EXHIBIT 1(B)

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**EXPERT REPORT OF WILLIAM A.V. CLARK, PH.D.**

William A.V. Clark, Ph.D, Department of Geography, University of California, Los Angeles,  
October 28, 2016

## **1. THE QUESTION**

A question which routinely emerges in demographic analysis is whether some pattern is the outcome of chance or the result of specific actions by one or more actors. A similar and related question is whether a particular policy disproportionately impacts a particular group, often defined by race, ethnicity or national origin. The current report deals with such a situation. Does the policy requiring proof of citizenship in a mobile home park disproportionately impact Hispanic families? To assess this question, this report analyzes the demographics of the Hispanic population in Virginia, Fairfax County, Fairfax City and Census tract 4406 (“Tract 4406”), which is the tract in which the Waples Mobile Home Park (the “Park”), the subject of current litigation, is located.

## **2. FINDINGS AND OPINIONS**

**a.** The Hispanic population of Fairfax County, Fairfax City and Tract 4406 is proportionately greater than the State as a whole.<sup>1</sup> Tract 4406 has proportionately almost twice as many Hispanics (29.1%) as Fairfax County (16.0%) and nearly four times the proportion of the State (8.4%). Any policy focused specifically on the sub-area defined by Tract 4406 will have a disproportionate impact on the Hispanic population.

**b.** Large single family housing predominates in Virginia, Fairfax County and Tract 4406. Approximately 68 percent of the housing stock is owned. There is a small proportion of mobile homes (*i.e.*, manufactured homes) in the State (5.3% of the housing stock Statewide), 0.5 percent in Fairfax County, and none in Fairfax City. However, in Tract 4406, 12.4 percent of the housing units are mobile homes. A residential policy specifically in Tract 4406 will have a greater effect on those living in mobile homes when the policy is directed at that housing type.

**c.** In general housing costs are above national averages in Fairfax County, Fairfax City and in Tract 4406, with the exception of the small residential area of mobile homes. These mobile homes vary in value in the range of \$35,000 to \$60,000. In contrast median house prices are in the \$400,000 range in Fairfax County, Fairfax City, and the single family homes of the remainder of Tract 4406. The mobile homes are the only low cost homes adjacent to Fairfax City employment centers.<sup>2</sup>

**d.** The undocumented population in the United States is now estimated to be close to 11 million persons. The undocumented population is approximately 270,000 in Virginia, which constitutes 3.4 percent of the State’s population. It is proportionately double that in the Fairfax County area, where it is close to 8 percent of the County population. Using the best available estimates,

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<sup>1</sup> Fairfax County, Fairfax City and Tract 4406 also have higher proportions of Hispanics than the national average.

<sup>2</sup> I am defining low cost as house values in the lowest quintile of house values in Fairfax County.

somewhat greater than 30 percent of the Hispanic population in Tract 4406 is likely to be undocumented.

e. Tract 4406 is a Census tract on the adjacent boundary to Fairfax City. Much of the tract is suburban and the residential areas are largely expensive single family homes except for an area at the northeastern edge of the tract, where the Park is located. The Park provides low cost ownership housing close to employment opportunities in Fairfax City. Because the policy specifically affects that area and the homes in it, the impact of the policy on the Hispanic and the Hispanic undocumented population is likely to be much greater than for the tract as a whole.

f. The documents which outline the leaseholder agreements require Social Security numbers, or passport and visa and I-94 documentation and thus are directed at residents of the Park who are not citizens. Sixty percent of the list of residents (provided by counsel) who are, or were recently, residents of the Park have Hispanic surnames. As a disproportionate number of Hispanics are not citizens, a disproportionate number of residents will be impacted by the Park's leaseholder policy.

### **3. DATA AND RESOURCES**

The research and opinions in this report are based on a background of research and expert testimony on housing patterns, housing segregation, and housing discrimination. In addition, I have carried out specific demographic studies of Fairfax County and the tracts within the County.

My research on Virginia, Fairfax County and Tract 4406 has relied on American Community Survey Census materials from the U.S. Census Bureau, data from the Center for Migration Studies and the Migration Policy Institute. The data from the Census was downloaded using American Factfinder. The data included population counts for the State, Fairfax County and City and Tract 4406. The data were used to compute percentages of the Hispanic (Latino) population. Data from the Pew Foundation, the Center for Migration Studies (CMS) and Migration Policy Institute (MPI) were used to report the undocumented population.

The maps provide the location of Fairfax City and Tract 4406, and the layout of the Park.

I reviewed the documents related to the application for lots at the Park. The "Future Resident Information Guide" (5-14-2015) has the stipulation that applicants must provide Social Security numbers and/or passport and visa and I-94 documentation. I also reviewed documents which are lists of present or recent residents of the Park. I used Census documentation of Spanish surnames to identify the Hispanic population who were listed as present or recent residents of the Park.

I reviewed Court filings and court judgments from this case, including the complaint, and the court's memorandum denying Defendants' motion to dismiss.

### **4. QUALIFICATIONS**

I am a geographer and demographer by training and I am Research Professor of Geography at

UCLA. My research interests are in residential mobility, housing choice, neighborhood change, and the impacts of demographic shifts, including international migration, on local areas. I have published widely on the issues of housing choice, residential separation and the distribution of housing in cities. My publications include nine books and approximately 400 research papers and reports. The books, Residential Mobility and Public Policy (edited), Modelling Housing Market Search (edited), Human Migration, and Households and Housing: Choice and Outcomes in the Housing Market (co-authored) and the Sage Handbook of Housing Studies are volumes that address issues of housing search, housing choice and housing outcomes and housing segregation. I previously taught graduate courses on housing and migration and undergraduate courses on population. I have been a visiting professor at Universities in Europe, New Zealand and Australia. I was a fellow at the Netherlands Institute for Advanced studies in the Humanities and Social Sciences in 1993 and held a Guggenheim Fellowship in 1994-95. In 1997 I was elected an Honorary Fellow of the Royal Society of New Zealand, and in 2003 I was elected to the American Academy of Arts and Sciences. In 2005, I received the Decade of Behavior Award for my research that influences public policy, and I was elected to the National Academy of Sciences. My curriculum vitae provides a complete summary of my educational background, work experiences, consulting, publications and research contributions (**Exhibit A**).

## 5. ANALYSIS

### *Population*

The relevant geographical units, in increasing locality, for an analysis of disparate impact are the Commonwealth of Virginia, Fairfax County, Fairfax City and Tract 4406. For each of these units the table provides data on the total population, the Hispanic (Latino)<sup>3</sup> population and the proportion Hispanic at each scale of geography.

	Virginia	Fairfax County	Fairfax City	Tract 4406
Population	8,185,131	1,117,072	23,507	3,294
Not Hispanic	7,497,866	938,150	19,684	2,337
Hispanic (%)	687,265 (8.4)	178,922 (16.0)	3,823 (16.3)	957 (29.1)

Source: American Community Survey 2009-14 Estimates

### *Housing*

In general housing costs are above national averages in Fairfax County, Fairfax City and in Tract 4406, with the exception of the small residential area of mobile homes. These mobile homes vary in value in the range of \$25,000 to 60,000.<sup>4</sup> In contrast, median house prices are in the \$400,000 range in Fairfax County, Fairfax City, and the single family homes in the remainder of Tract

<sup>3</sup> The terms Hispanic and Latino are used interchangeably to describe the inhabitants of the United States who are of Latin American or Spanish origin—that is, Hispanic or Latino Americans.

<sup>4</sup> <http://www.homes.com/for-sale/fairfax-county-va/mobile-homes/> and <http://www.zillow.com/fairfax-county-va/mobile>

4406. The mobile homes are the only low cost homes adjacent to Fairfax City employment centers.

	Virginia	Fairfax County	Fairfax City	Tract 4406
Housing Units	3,403,241	409,108	8,745	948
Mobile Homes (%)	180,419 (5.3%)	2,070 (0.5%)	0 (0%)	118 (12.4%)
Median House Value	\$243,500	\$486,900	\$462,800	\$428,400

Source: American Community Survey 2009-14 Estimates

### ***The Undocumented Population***

Estimates of the undocumented population have been calculated by the Center for Migration Studies, the Pew Foundation and the Migration Policy Institute. There are only very small differences in the reported numbers in these studies. To have a consistent set of numbers, I have used data from Center for Migration Studies (CMS) for all calculations. The estimated values are similar in the data available from the Pew Foundation and the Migration Policy Institute. The CMS estimates are provided with a detailed description of the methods<sup>5</sup> and are the only estimates which are provided at the local geographic area (PUMA).

Virginia has a large undocumented population which has increased significantly in the past decade. Estimates of the Virginia undocumented population from the Center for Migration Studies, the Pew Foundation and the Migration Policy Institute are about 270,000 persons. The Migration Policy Institute estimates an undocumented population of 272,000 in Virginia and 94,000 in Fairfax County.<sup>6</sup> The undocumented population is approximately 3.5 percent of the Virginia population. The CMS reports an undocumented population of 268,916 and a Fairfax County undocumented population of 97,665.<sup>7</sup>

	Virginia	Fairfax County	Tract 4406
Total Population	8,185,131	1,117,072	3,294
Total Undocumented (%)	268,916 (3.4)	97,655 (8.0)	
Total Non Hispanic	7,497,866	938,150	2,337
Undocumented	95,196	42,773	
Undocumented ratio	1.3	4.6	
Total Hispanic	687,265	178,922	957
Undocumented	173,720	54,882	301
Undocumented ratio	25.3	30.7	31.4

The smallest relevant geographic area for which there are undocumented population statistics is

<sup>5</sup> Robert Warren (2015) The Estimated Undocumented Population 11 Million: How Do We Know. Center for Migration Studies New York.

<sup>6</sup> <http://www.migrationpolicy.org/programs/us-immigration-policy-program-data-hub/unauthorized-immigrant-population-profiles>

<sup>7</sup> <http://cmsny.org/new-unauthorized-database-released>



the Fairfax County Central, Fairfax City, Burke PUMA (Public Use Microdata Area). The PUMA has a population of 157,949 and the Hispanic population is 18,954. Of the Hispanic population 5,944 (31.4%) are estimated to be undocumented (CMS database statistics from the PUMA data tool). We can apply that estimate to the 957 Hispanics in Tract 4406, which yields an undocumented Hispanic population of 301 in Tract 4406.

There is of course variation in small area estimates (the Margin of Error). The estimate and variation for the Hispanic population in Tract 4406 is +/-251, or 26%. Applying this variation to the undocumented population yields a range of 223-379. Because of the particular structure of the tract – concentrated lower cost housing in the Northeast section of the tract – it is also likely that a large proportion of the undocumented population is located in that subarea such that the policy's impact would be greater in that subsection of the tract.

The residents of the Park are estimated to be 60 percent Hispanic/Latino. The estimate is based on a surname analysis of a Park resident list provided by counsel (*i.e.*, WAPLES00001335). I evaluated the names on the list against the Census List of Hispanic Surnames. The approach and techniques are discussed in the Census Technical Working Paper No 13. March 1996.<sup>8</sup> The Census list is available without cost through Appendix E: NAACCR (North American Association of Central Cancer Registries 2003). It is also available for a fee from the U.S. Census.

In sum, comparing the undocumented population in Fairfax County and Census Tract 4406 to other groups at the County and the Census tract level reveals a disparate impact at both levels. Undocumented immigrants constitute 30.7 percent of the Hispanic population in Fairfax County and 31.4 percent in Census Tract 4406. Undocumented immigrants are only 4.6 percent of the non-Hispanic population in Fairfax County. Thus, Latinos are nearly 7 times more likely to be undocumented than other groups and so 7 times more likely to be adversely affected by the policy.

### ***Geography***

The Waples Mobile Home Park is located in the Northeast section of Tract 4406 (Figure 1). The tract is adjacent to Fairfax City and the Park provides low cost housing for residents who likely work in jobs in employment centers along Route 66, I-66 and in Fairfax City. There are no mobile home units in Fairfax City and limited low cost housing.

The Park is adjacent to the Fairfax Shopping Center and provides approximately 150 lots for mobile homes (Figure 2). The remainder of Tract 4406 is high value single family homes. Because the policy of the Park is directed specifically to a small area of Tract 4406 it is probable that the effect on the population in that area is greater than it is for the tract as a whole. This view is confirmed by the analysis of the resident list discussed above.

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<sup>8</sup> D.L. Word and R C Perkins Building a Spanish Surname List for the 1990s – a New Approach to an Old Problem. Population Division US Bureau of the Census, Washington, D.C.

**6. TESTIMONY IN COURT OR BY DEPOSITIONS IN THE PAST FIVE YEARS**

(a) *Little Rock School District v. The State of Arkansas* 2013 (Deposition).

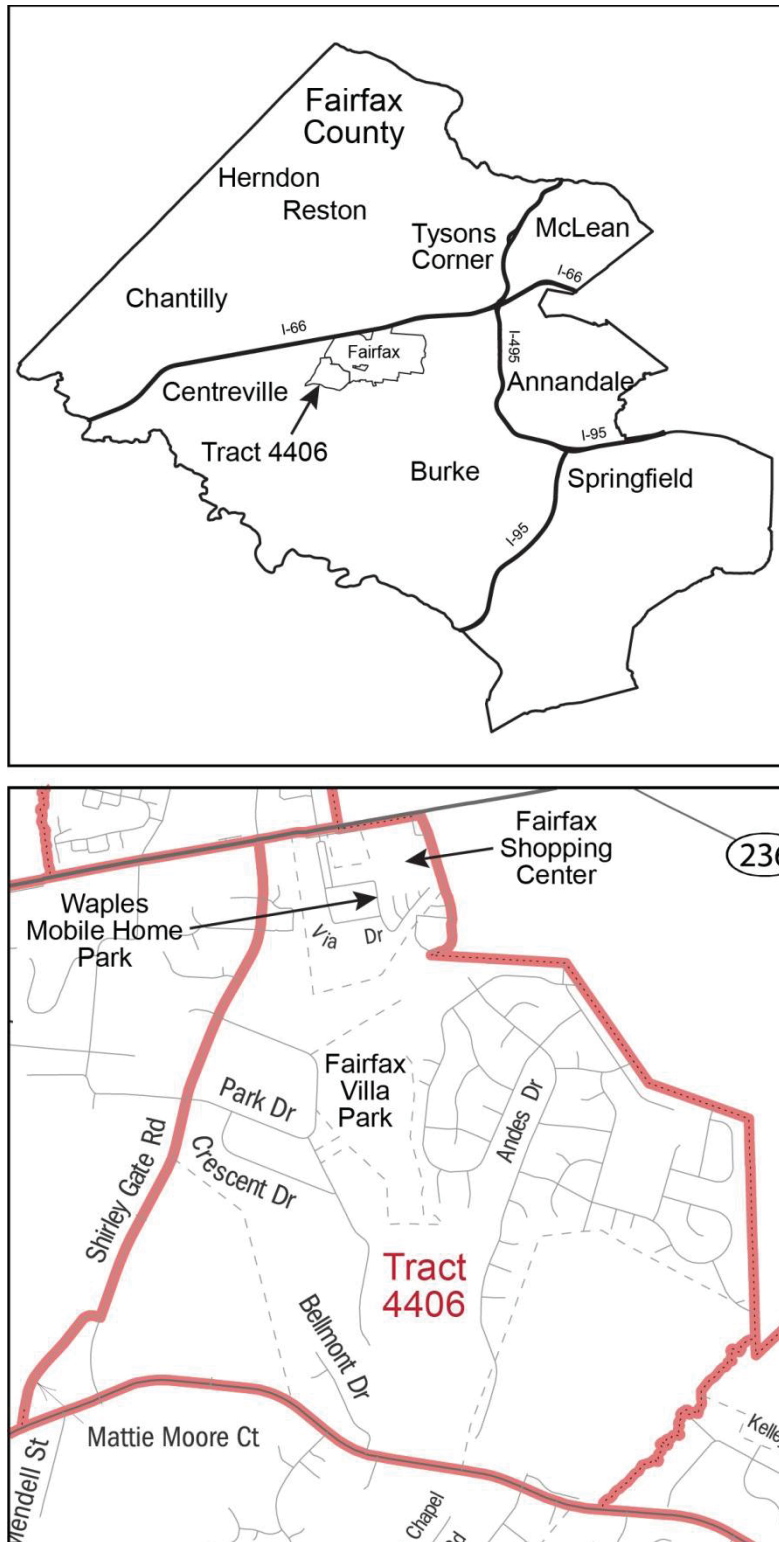
(b) *Ronda Everett v. Pitt County Schools, United States District Court, Eastern District of North Carolina, Old Washington Division, Case number 6:69-CV-702-H.* (North Carolina) 2012-2013 (Deposition and Testimony).

(c) *Jones, et al. v. Travelers Casualty Insurance Company* Case No. CV 13-02390 LHK United States District Court, Northern District of California 2015 (Deposition).

**7. COMPENSATION:** My hourly rate for research and testimony in this case is \$300. My compensation is not tied to or contingent upon the outcome of this litigation.

Signed: William A.V. Clark  
William A.V. Clark

Date: 28 October 2016



**Figure 1: Maps of Fairfax County and Tract 4406**

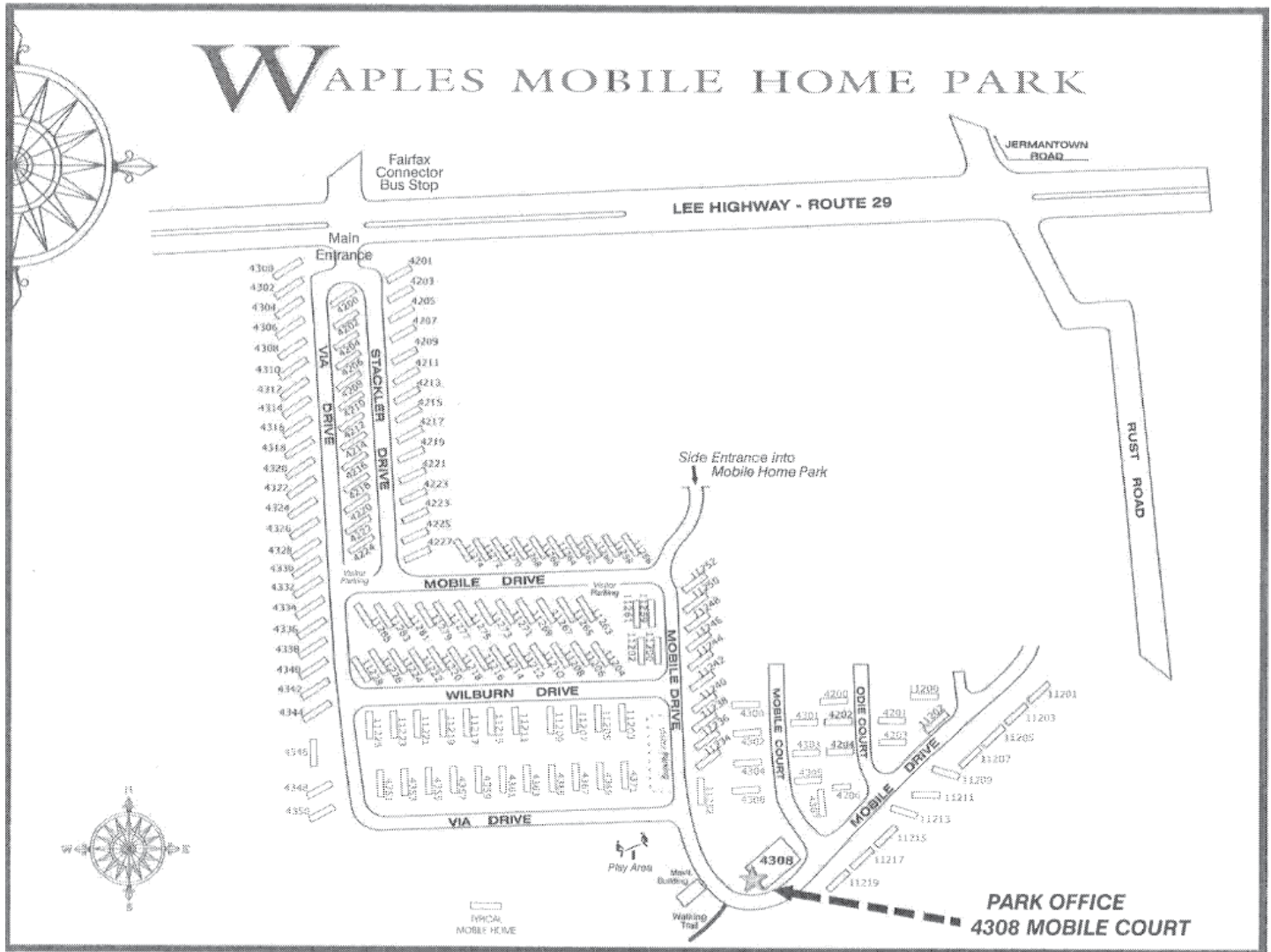


Figure 2: Map of the Waples Mobile Home Park

# EXHIBIT 1(C)

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**EXPERT REPLY REPORT OF WILLIAM A.V. CLARK, PH.D.**

William A.V. Clark, Ph.D, Department of Geography, University of California, Los Angeles,  
December 9, 2016

The purpose of this reply report is to respond to the opinions of Defendants' expert, Dr. Daniel Weinberg. Dr. Weinberg raises three issues with respect to my estimates of the undocumented population in Census Tract 4406: (1) He questions my specification of the margin of error, (2) he suggests that not adjusting for the undercount overestimates the point estimate of Hispanics in Census Tract 4406, and (3) he suggests that I should adjust for the Asian undocumented population to correctly estimate the level of the disproportionate impact of the Hispanic undocumented population. I address each of these points in the comments which follow.

Notably, Dr. Weinberg does not challenge my statements regarding disproportionate impact at the State and County levels. In fact, the 30.7 percent Hispanic undocumented ratio for Fairfax County (Clark Report at 4) is very close to my estimate for Census Tract 4406. This supports the finding of a disproportionate impact at both the County and local level.

## **1. POINT ESTIMATES AND THE MARGIN OF ERROR**

Both Dr. Weinberg and I provide a point estimate of the number of undocumented Hispanics in Tract 4406. I estimate the number at 301 (Clark Report at 4) and Dr. Weinberg estimates that value at 287 (Weinberg Report at 6). These estimates are reasonable estimates of how many undocumented Hispanics are in Tract 4406, a number which changes over time as people move in and out of residences within the tract. Our estimates are not dissimilar, and reflect the reality that there is a large number of undocumented Hispanics in Tract 4406.

The disagreement comes with respect to the reliability of that estimate. I use a margin of error of 26 percent based on the Census-reported margin of error for Hispanics in the tract. The range of those values is from 223-379. Dr. Weinberg, after discussing sampling methodology and sample error, asserts that the margin of error should be 101 percent (Weinberg Report at 7). He does not calculate a range but his margin of error would produce a range of approximately 0-602. This is an instance where the focus on the margin of error alone can lead to implausible results. We both agree there are undocumented Hispanics in the tract, and our joint point estimates suggest a reasonable number is close to 300, clearly with some margin of error but that value is not 0 and not 602. Dr. Weinberg's argument and total focus on margin of error obscures the reasonableness of a result which is a point estimate of about 300 undocumented Hispanics during the Census period of 2010-2014.

## **2. UNDERCOUNTING AND UNCERTAINTY**

It is sufficiently difficult to estimate the actual number of undocumented Hispanics without trying to adjust further for over-count and undercount. In his statement, Dr. Weinberg discusses both and concludes that there was an undercount of Hispanics, and he adjusts his point estimate upwards from 283 to 287. Adjusting for undercounting is a difficult process and more so for the undocumented population who are more likely than Hispanics as a whole to be undercounted. Nevertheless, the fact that Dr. Weinberg computes an estimate close to my estimate suggests that the actual point estimate is in the range we have both provided. In either case there are an



estimated approximately 300 undocumented Hispanics in Tract 4406.

In the process of estimating populations there is always uncertainty. Demographers use their best judgement, and statistical tools, to provide a specific value which is believed to best represent the true number of undocumented Hispanics in a region, or local area such as a tract. As Dr. Weinberg correctly notes, our estimates are based on samples and each sample will produce a slightly different point estimate. To visualize these outcomes, one can imagine a bell curve over the point estimate where values closer to the point estimate are more likely than values further away even if we use different probabilities for the margin of error.

### **3. ESTIMATING THE ASIAN UNDOCUMENTED POPULATION**

Dr. Weinberg is correct that I did not adjust for the Asian undocumented population. I did not do so as the proportion of Asians in Waples Mobile Home Park ("the Park") is small, approximately 12.1 percent of all residents (using an Asian surname analysis) in comparison with 60 percent Hispanic residents. Moreover, the Asian undocumented population is not at issue in this litigation. But as it is possible that the undocumented Asian population could affect the magnitude (though not the existence) of the disparate impact, I recalculated the magnitude of the disparate impact.

It is important to note that my calculations of the disparate impact used the data for Fairfax County as a whole where I estimated the undocumented ratio for the non-Hispanic population without adjusting for the Asian undocumented population. The undocumented Hispanic population is 30.7 percent and if we use the same methodological procedure as in the original Clark report, the Asian undocumented ratio is 15.7 percent. The percent undocumented for other groups is 1.5 percent. Thus I am able to say that Latinos are nearly twice as likely to be undocumented compared to Asians and 20 times more likely to be undocumented than other groups, and are thus substantially more likely to be adversely affected than any other group. There is still a major disproportionate impact and the substantive conclusion of my initial report is not changed.

With respect to the Asian alone population in Tract 4406 that population is estimated by the American Community Survey (2010-2014) to be 682 with a margin of error of +/-128. Using the same logic as the estimation procedure for Hispanics, 16.5 percent of Asians in the PUMA are undocumented and if we apply that percent to the 682 Asians in Tract 4406, I estimate the undocumented Asian population in tract 4406 as 113 with a range of approximately 92-134. Dr. Weinberg estimates the population as 105. If we remove the Asian population from the calculations in fact the undocumented ratio decreases for non-Hispanic/non-Asian groups which would increase the impact of Hispanics vis-a-vis non-Hispanics and non-Asians. Even accounting for the Asian undocumented population, my ultimate conclusion remains the same.

### **4. SUMMARY AND REASSERTION OF DISPARATE IMPACT**

The point estimates provided by me and by Dr. Weinberg are still our best estimates, with the caveat that there is a range of error around that number, but my point estimate is, in my opinion and based on my analysis, an acceptable estimate of the undocumented Hispanic population.

Sometimes demographers and statisticians become focused on the methodology and do not pay sufficient attention to the most reasonable outcome. There is a very large absolute number and high proportion of Hispanic individuals in the Park. Selective enforcement of tenant retention policies has had and while in force, will continue to have a disparate impact on this Hispanic population.

## 5. REFERENCES

Expert Report of William A. V. Clark October 28, 2016

Expert Report of Daniel H. Weinberg November 28, 2016

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9<sup>th</sup> day of December, 2016 in Los Angeles, California.

Signed: \_\_\_\_\_

William A.V. Clark